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-70872



Submission by Canadian Broadcasting
Corporation to Canadian Radio-
Television Commission re proposed
amendments to broadcasting Regulat-
ions.

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The CBC has studied carefully the Commission's notice of public hearing issued February 12, 1970, together with its accompanying press releases, dealing with proposed amendments to the broadcasting regulations. The result of our study is presented in this brief. The first part of the brief deals with the proposed changes in the television regulations and the second with the radio amendments. Our comments are numbered to accord with the sequence followed in the notice of hearing.

Proposed Amendments to the Radio (TV) Broadcasting Regulations

ulation
1.

No comment.

ulation
2.

The CBC takes this statement to mean that all the TV regulations now in force remain unchanged except where they are logically inconsistent with any of the amendments now proposed. In effect, therefore, the present Regulation 6(4), respecting Canadian content continues unaltered for the time being. We have noted the Commission's statement in its February 12 press release that it "proposes to eliminate provisions by which certain programs of non-Canadian origin have been counted as Canadian". However, since this intention is not reflected in the amendments currently proposed, we have not commented formally on it, though it is reflected at several places in the brief in our thinking about the Corporation's future situation.

ulation
1)(aa)

The proposed definition of "advertising material" does not, per se, present any problems. However, when combined with the restrictions on the number of interruptions and the amount of advertising material permitted, it gives rise to practical difficulties. We shall refer to these in our comments on the proposed 8(1)(a) and 8(3)(a).

lation
1)(ii)

The proposed definition of "programme" and the parenthetical definition of all interruptions as "advertising material" do not seem to meet a number of situations that arise in the course of day-to-day broadcasting. For instance, what about a quarter-hour "bulletin board" program on a local station dealing with current and upcoming activities in the community? Public service interruptions are obviously "directly related to the purpose or pattern" of such a program.

We shall have further comments on the relationship between "programmes" and "interruptions" in connection with 8(3).

lation
1)(j)

No comment.

lation
1)

The Corporation fully supports the objective of this proposed amendment and, in general, is prepared to take whatever steps are necessary to meet the required Canadian-content quota. It wishes to point out, however, that the regulation, as drafted, is too unconditional to do justice to the complicated situation

to which it is intended to apply. In its present form it would, we believe, cause unnecessary hardship to both audiences and broadcasters. We believe it should be amended so that, without losing its essential character, it will recognize more adequately the realities with which broadcasters, and in particular the CBC, must cope.

The CBC wishes to bring to the Commission's attention several points which it believes the proposed Canadian content regulations should take cognizance of. These are: the measuring period, the need for an international or universal program category, time zone differential problems, seasonal variations, international co-productions and audio dubbing.

The Measuring Period

In the CBC's view, the proposed four-week period in which Canadian-foreign is to be measured is much too short and could involve program changes which would appear arbitrary and irritating to both viewers and advertisers.

The need for flexibility is very real if the content requirement of the regulation and the unanticipated but legitimate demands of alert network broadcasting are both to be met. Even where the special programming that would adversely affect Canadian-foreign balance was anticipated before the four-week period began the need to restore the balance within such a short period would seem likely to lead to too much schedule joggling, with its accompaniment of added operating costs and audience irritation.

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For these reasons the Corporation believes that a quarterly rather than a four-week base for the calculation of Canadian content should be maintained. While not privy to the thinking which led the Commission to propose this change, the CBC does not believe that use of the 13-week span, at least by the Corporation, would defeat the purpose which the proposed Regulation 6(1) sets out to achieve.

The Corporation recommends, therefore, that the present calendar quarter (13-week) base for measuring Canadian content be maintained. This base coincides with our established scheduling, budgeting, and auditing procedures and with the prevailing pattern of contracts with many of our performers and distributors. Such a base would give the schedule reasonable flexibility to meet the irregular need for pre-emptions for international events or special foreign programming demanding Canadian exposure but not rated as Canadian content.

The need for an International or Universal Program Category

We have already stated our understanding that the present definition of Canadian content, as stated in Regulation 6(4) and as interpreted over the years by the regulatory authority, remains largely intact. That is to say, not only Canadian-produced programs, but programs featuring special events outside Canada and of general interest to Canadians would continue to qualify as Canadian content for purposes of the proposed Regulation 6(1). The "special events outside Canada and of general interest to Canadians" which we have in mind would

include such events as the following (not necessarily in order of importance):

- Deaths of such figures as the Sovereign, President of the U.S.A., Pope, etc.
- United Nations sessions.
- Space shots.
- Royal occasions (Coronations, Investitures, Speeches by the Queen, etc.).
- U.S. Presidential elections, British and French national elections, etc.
- Nominating conventions of major American or British parties.
- International crisis situations, e.g., the Middle East, Vietnam, etc.
- Generally, events occurring outside Canada in which as a rule Canadians are participating. These include the Olympic, Pan-American and Commonwealth Games, the Stanley Cup, World Series baseball, International Championships, (e.g., skiing, curling), and such events as Expo '70.
- We presume also that imported educational programs for use in formal (i.e., curriculum-related) ETV would continue to qualify as Canadian content.

While it is our understanding that programs such as the foregoing would continue to be classified as Canadian for the time being, we realize that the Commission has expressed its intention to alter this situation substantially. If and when regulations amendments to this effect are proposed the Corporation would probably take the position that any programs of the kind listed above which were no longer entitled to be considered as Canadian content should be given the same neutral content rating as is proposed in the recommendation immediately below.

The matter of what is and what is not to be considered Canadian for purposes of determining Canadian content is of major importance to the Corporation in providing the balanced and comprehensive service which the Act calls for. With this in mind we would suggest that there is a category of programs originating outside Canada which is of sufficient importance to Canadians to be granted an

"international" (i.e., neither Canadian nor foreign) rating.

This category would include coverage of major international sports events and cultural and/or educational programs or program series of international distinction. We suggest that this category would cover such productions as the BBC's CIVILIZATION series, THE FORSYTE SAGA, SESAME STREET, performances by La Comédie Française, documentary programs of universal appeal and programs from international arts festivals (Edinburgh, Monte Carlo, etc.).

The Corporation recommends that the proposed Regulation 6(1) be modified to give networks and stations a neutral (neither Canadian nor foreign) credit for programs in the "international" or "universal" category but that this credit be limited to a fixed percentage of the total hours of programming broadcast during the period over which Canadian content is calculated and that the total number of hours for purposes of content calculation be reduced by the number of hours receiving the neutral credit. We believe that such an amendment would respect the priority given to Canadian productions and at the same time encourage broadcasters to bring to Canadian audiences programs of international interest and quality which would make a genuine contribution to Canada's social and cultural life but which might not attract mass audiences.

If the regulation were to have the effect of reducing the Corporation's ability to include high-quality international programs and program series in its prime time schedule it would, we believe, do a disservice to Canadian audiences and Canadian broadcasting.

There remains the question of determining what international programs are of such calibre as to qualify for the neutral credit proposed here. There is no absolute answer. However, the criteria suggested above, together with others that the Commission could formulate, should suffice to guide broadcasters; we do not believe the Commission would have great difficulty in making its purpose clear. The Corporation does believe, however, that, other things being equal, the matter should be dealt with by regulation, with the broadcaster's performance assessed after each event, rather than by requiring him to seek a Canadian content classification in advance of broadcast for particular programs or series. In our view the former procedure is administratively simpler and, as well, has the advantage of placing the initial responsibility squarely on the broadcaster.

Time Zone Differential Problems

There are several anomalous situations under this heading which we feel the Commission should take cognizance of in enacting or, at least, in applying the proposed 6(1).

The first of these affects Newfoundland and arises from the half-hour time difference between the Newfoundland and Atlantic time zones, coupled with the lack of technical facilities to overcome it in scheduling. The result of this combination of circumstances is that prime-time programming which would be scheduled on the rest of our English network between 6:30 and 11:30 p.m., local time to meet the Canadian content requirement would be broadcast in Newfoundland

between 7:00 and 12:00 midnight local time. Under the circumstances therefore, it would seem only fair that for the purposes of the regulation, prime time for CBC network stations in Newfoundland be 7:00 to 12:00 p.m., rather than 6:30 to 11:30 p.m.

The second anomaly concerns stations in cities and areas which remain on standard time while the rest of the country is on daylight time. When the network goes to daylight time operation each year these stations receive the network schedule with a one-hour time displacement which could adversely affect their Canadian content credit in prime time. This is really a variation of the Newfoundland situation mentioned above and, as for Newfoundland, the technical facilities required to cancel the effect of the time difference are not available. We believe that this situation should be taken into account in fixing the prime time period and calculating the Canadian content achievement of such stations.

The third situation related to time zone differentials which we wish to draw to the Commission's attention concerns certain regularly scheduled programs (e.g., sports events) which must be distributed simultaneously across the network and to which normal delay arrangements do not apply. Such programs obviously disrupt the normal schedule delay pattern and, thus, could adversely affect the prime-time Canadian content achievement of certain stations/regions.

NHL hockey is perhaps the most obvious example. An NHL game played and broadcast in the East between 8:00 and 10:30 p.m., is seen in British Columbia between 5:00 and 7:30 p.m. The normal practice

of our B.C. network stations in such a case would be to reschedule in their 8:00 to 10:30 p.m., period the programming which was displaced by the 100%-Canadian hockey game. But this programming may well not be all Canadian content. The result is that, because of the time zone differential, the Western stations are placed at a disadvantage relative to stations in the East, with respect to Canadian content in prime time. The same considerations apply to special Canadian-produced programs which are scheduled on the network from time to time., e.g., a Constitutional Conference.

The Canadian content achievement of non-connected stations which receive network service on a recorded-delay basis could also be adversely affected by the scheduling situations described above.

The various situations described here have not presented a problem under the existing Canadian content requirement, particularly in prime time. However, we believe that some allowance should be made for them in applying the proposed 60% requirement.

A final special situation which should be mentioned is that arising from the breakdown of network facilities for technical reasons. In such circumstances normal network service is not available and the replacement programming which networks and stations will have to use may not have the same Canadian content as the network service. We think that in such cases the replacement programming should automatically receive the same Canadian content rating as the network programming it replaces.

Seasonal Variations

The Corporation anticipates real difficulty in meeting the 60% Canadian content requirement during the summer season when a number of factors combine to reduce the volume of Canadian production. One of these factors is the disappearance from our network schedules during the summer of certain winter season Canadian series, e.g., school broadcasts and NHL hockey. Another is the changed pattern of work in many of our operating departments as a result of summer vacations. This affects public affairs programming in particular.

Our collective agreements with staff unions also include arrangements which make it difficult to maintain a full level of production. Our contract with the technicians' union, for instance, guarantees members of this key bargaining unit three weeks of vacation and 13 week-ends off during the year and it is natural that most of this off time is concentrated in the warm weather months.

When these factors are combined with the possible disappearance of the Commonwealth-francophone credit (offset to some extent by the proposed international (universal) classification credit) the dimensions of the operating problem we foresee become clear.

The Corporation recommends, therefore, that the Canadian-content requirement of the proposed Regulation 6(1) be reduced during the July-August-September quarter.

Such an easement would not be unprecedented. When the 55% rule was first introduced it contained a clause reducing the requirement to 50% during the summer season in the early years of the life of the regulation. We feel that a similar abatement would be justified in the present situation, at least until the effect of the new regulation can be fully assessed under operating conditions.

International Co-productions

This term is intended to cover agreements between the CBC and broadcasting organizations in other countries for the production of programs by each of the participating countries, with all programs to be broadcast in all the member countries. Intertel on the English side and the Communauté Radiophonique de langue française are the best known of these arrangements. Another type of co-production would be a reciprocal arrangement between the CBC and the national broadcasting service of another country (e.g., France's ORTF) under which each country would produce a program or series for showing in the other.

The Corporation both believes that having in mind the quality of programs contemplated by such arrangements and the advantages which accrue to Canada therefrom, all programs made under these types of co-production arrangements should continue to qualify as Canadian content. In the former type the CBC pays the full production cost of one program in the series and receives the others gratis. However, its participation as a member of the consortium is an essential feature of the whole enterprise and in that sense

the Corporation may reasonably be considered as an indirect financial contributor to all productions in the series. The same considerations apply to the two-party reciprocal agreement for co-production. In both cases the favourable international publicity which such co-productions bring to Canada should not be overlooked.

Certainly, if programs resulting from these kinds of co-production arrangements are not to continue to receive full Canadian content credit, we believe they should at least be granted a neutral credit of the kind discussed earlier in our brief.

Audio Dubbing

We have in mind here the situation covered by the present Regulation 6(5)(c) in which a 25% Canadian content credit is given to certain programs of which the audio portion is converted in Canada to either English or French by a process of lip synchronization. For the Corporation this is very largely a French Network concern.

This dubbing process has increased greatly in expense and importance in recent years and has provided correspondingly more work for Canadian artists and technicians and more business for Canadian firms. The Corporation estimates that, for programs which require language conversion, the dubbing process currently accounts for more than 50% of the total cost of the program.

We are not sure whether the present Regulation 6(5)(c), which allows a 25% Canadian content credit for dubbing, would be affected by the

cancellation of 6(5)(a) and (b) which is envisaged in the Commission's press release. We believe that it should not be but that, on the contrary, the Canadian content credit for audio dubbing should be increased substantially.

A related feature of the CBC's French Network operation is the practice of providing French-language commentary to replace the (usually) English commentary on special news and feature broadcasts originating outside Canada. This is a frequent occurrence; the Apollo space shots are an obvious example and the practise is common in coverage of sports events. At present the Regulations offer no Canadian content credit for this use of Canadian talent and Canadian (audio) production facilities on programs which do not otherwise qualify as Canadian. The Corporation believes the Regulations should be amended to include such a credit.

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In our comments on the proposed 6(1), (under the heading "The Measuring Period"), we recommended that the present calendar quarter (13-week) base for measuring Canadian content be maintained. We related this recommendation to established CBC scheduling and budgeting procedures and to the prevailing pattern of many of our contracts. For similar reasons, the Corporation recommends very strongly that the starting date for the application of the provisions of 6(1) to itself be October 1, 1970, rather than September 1.

The inauguration of the fall schedule and related campaigns by major advertisers, as well as existing contracts with distributors, are compelling arguments for this recommendation. We cannot over-emphasize the importance of our recommendation for the October 1 date. To bring the new 6(1) into effect on September 1 would create an impossible situation for our networks.

regulation
3.(1)(a)

No comment.

regulation
3.(1)(b)

The Corporation feels strongly that this proposal, however well-intentioned, could cause a great deal of annoyance for viewers and a great many problems for broadcasters. Consider for instance a program like HOCKEY NIGHT IN CANADA. It would seem unrealistic to suggest that every commercial message in this program (27 in all, including regular commercials and 10-second 'supers' during play) be introduced with a 3-second visual or audio separation.

Furthermore, where to put the separation is a very practical problem with any live-off-the-line U.S. program, where the Corporation would have to try to fit 3-seconds plus 60-seconds into a fixed 60-second position. Our problem would be increased if it were the intention of this proposed amendment to require a 3-second separation after, as well as before, each commercial interruption.

Having in mind the interests of the viewer, the variety of situations that can arise in different network and local program formats and the need for operating flexibility, particularly in network operations, the Corporation recommends that the specific requirement for a 3-second separation be replaced by a general requirement that any advertising material be clearly separated from the body of the program in which it appears. This would leave to the broadcaster the responsibility for deciding what separation should be provided. Naturally, the broadcaster would be answerable to the Commission for the adequate discharge of this responsibility.

regulation
3.(3)(a)

Some questions arise in connection with this proposed regulation. These concern live U.S. shows, the definition of "in the body of a programme", and the definition of "interruption".

Live U.S. Shows

We have in mind here American network programs (the Ed Sullivan Show, for example), which are simultaneously broadcast on the CBC network. Such programs have pre-planned commercial interruptions built in at the point of origin. The Corporation cannot reduce the number of these (the hour-long Sullivan show has six interruptions) and, accordingly, we would expect the Commission in applying the regulation to recognize a situation over which the Corporation and the member stations of its networks have no control.

Definition of "In the Body of a Programme"

Our question here is whether "in the body of a programme" means anywhere within the total time period occupied by a program or only within the actual story line or plot content of the particular show. We think that the former is meant but see ambiguities in the present phraseology of 8(3)(a) and 8(3)(c) which we believe should be resolved in the final wording of the regulation.

Definition of "Interruption"

Our last comment was related to the question of placement of interruptions. The present one is concerned with what constitutes an interruption or, in other words, when is an interruption not an interruption? The question is not facetious. We have already referred to it in connection with the proposed 2(1)(ii) when we mentioned the difficulty of classifying the "interruptions" in a classified announcement program, a category for which the existing Regulation 8(a) makes provision.

Other difficulties of interpretation are raised if any commercial material without exception is to be classified as an interruption. For example, when prizes are given in kind, on, say, a quiz show, should each reference to the prizes be counted as an interruption in terms of 8(3)(a)? We think not.

Similarly, we do not believe that an invitation from a host at the end of a program not to miss a certain other program should be considered as an interruption.

In pointing to these problems of interpretation the Corporation is not trying to defeat the objective (which it supports) of reducing the undue invasion of program time by advertising material and, equally, of reducing the viewer irritation which results from this practice. It only wishes to suggest that the word "interruption" needs a more comprehensive definition than it receives in the proposed regulations.

ulation
(3)(b)

The question of whether an interruption is permitted in a program of less than quarter-hour length arises here. Does 8(3)(b) preclude even one interruption on, say, a ten-minute Sportscast? Also, would a commercial message at the beginning of such a program (i.e., before the sportscaster appears) or at the end (i.e., after he disappears), be considered an interruption?

ulation
(3)(c)

This sub-section specifically classifies a billboard as an interruption. It also says that an interruption is something

"which temporarily halts the sequence of events in a programme". But a billboard, by definition comes before anything else in the program. It is hard to see, therefore, how it constitutes an interruption.

Regulation
8.(3)(d)

No comment.

Regulation
8.(4)

Our brief has heretofore avoided comment on translation problems. However, we feel that the use of "radio-journal" in the French text of the proposed 8(4) is inappropriate in the television context. We suggest, instead, "télé-journal".

Proposed Amendments to the Radio (AM Broadcasting Regulations)

Regulation
4.(1)(i)

The CBC sees two practical problems in connection with this proposal. One is the difficulty which member stations of our radio networks would have in logging the Canadian music content of network programs. The other is that the CBC's present cataloguing system for recordings does not include the Canadian content information required by the proposed regulation. The former problem is the more serious. A point requiring clarification is whether "percentage" in line 4 of 4(1)(i) means percentage of the number of musical selections broadcast in the measuring period or of the total elapsed time of music broadcast in the period.

Canadian Music Content of Network Programs

The CBC English and French radio networks together include a total of 128 stations (34 CBC-owned and 94 private affiliates). * Together the two networks broadcast thousands upon thousands of programs in which music is included, over the course of a year. The task of supplying the required Canadian content information for each musical selection played on each of these programs to each of these stations for individual station logging would be immense.

The difficulty becomes even more intimidating when one considers the inevitable changes in the scheduled musical content of network programs, many of them at short notice or in emergency conditions. The whole enterprise would involve not only a complicated system of information distribution by the Corporation to each station on the networks but repetitive logging of the same information by all the stations.

To avoid this burden of work and expense and at the same time to ensure that the objective of the new regulation is met, the Corporation recommends that the Canadian-music-content requirements of the proposed regulation, insofar as they affect members stations of the CBC networks, apply only to music originated by each station when broadcasting independently, (i.e., not as part of a network), and that the Corporation be made responsible for supplying to the Commission satisfactory evidence of the Canadian content of all music in its network programs.

* Excluding LPRT's.

Cataloguing of Recordings

CBC stations and network centres have very large libraries of recorded music. Our Toronto library contains at least 50,000 discs, our Montreal library at least 75,000 and our Ottawa library about 18,000. The figures for our other radio production centres are correspondingly large. Moreover, the number of discs must be multiplied by a factor of 8 or 10 to obtain the number of separate musical selections on which Canadian content data (four items) will be required. And this reckoning does not take into account sheet music selections and music recorded on tape.

The present cataloguing of this huge volume of music does not include the Canadian content information required by the regulation. This obstacle can be overcome, of course, but it is going to take a lot of work and time to incorporate the required new data into our various library indexes.

However, the problem may not be completely solvable or, at least, not for a long time. Not only do our present libraries not contain the required Canadian content information; the new acquisitions we are constantly receiving do not contain it either. Thus, there may be insuperable difficulties in assembling the required data for a substantial part of the CBC's present and future music resources. No doubt this situation would start to change for the better under the impact of such a regulation as is proposed and it could be expected that an increasing volume of recordings satisfying the requirements of the regulation would flow to broadcasters. Presumably this is one of the results the Commission looks for.

In view of the large and very real problems described above the CBC questions whether the proposed 4(1)(i) can become fully effective by October 1, 1970. We can foresee that Canadian content reporting might be inadequate and subject to considerable error for some time after that, though a steady improvement could be expected.

The situation which the proposed regulation would create is obviously a most complex one for all radio broadcasters because of the mass of data involved and, often, the difficulty of obtaining the data. The Corporation, therefore, suggests that the Commission give consideration to initiating a joint study (involving CRTC, CBC and private broadcasters) to examine the problems and recommend procedures in the complicated field of identifying, cataloguing and reporting Canadian content in broadcast music.

lation
5)

No comment.

lation
6)

This sub-section achieves in another area the effect sought by the Corporation's recommendation under 4(1)(i) in respect of reporting Canadian content in music.

lation
7)

No comment.

lation
1)

No comment.

ation
1)(a).

The proposed regulation would appear to be directed primarily at stations operating on disc jockey formats and concentrating largely or exclusively on currently popular music in its various forms. But the CBC's music situation is quite different. Our networks make extensive use of such major sources of good music as Metropolitan Opera, the BBC Transcription Service and recordings from EBU (European Broadcasting Union) sources, all of which are non-Canadian.

Another point to be noted is that much of CBC's serious music on which it makes substantial expenditures, is scheduled between 11:00 p.m., and midnight. Under the proposed regulation we would receive no credit for major expenditures on Canadian musical talent in this time period.

In the opinion of the Corporation the proposed four-hour base on which Canadian content is to be calculated is too restrictive to accommodate some of the musical programs and projects which CBC networks can and should undertake. We have already recommended that, with respect to AM network programming, the CBC report on behalf of all stations on the network for a particular program the Canadian content of the music on that program. The Corporation recommends also that, having in mind the character of CBC network schedules and the relatively long term over which CBC musical programming is planned and executed, the time base for Canadian content calculation of music performed on network programs be one calendar week rather than four hours.

We feel, too, that the proposed 7:00 a.m., to 11:00 p.m., daily span does not do justice to our situation. As already indicated we would like to see it extended at one end from 11:00 p.m., to midnight to allow recognition of our Canadian music activities in that period. We would also suggest that the start of the day for purposes of this computation be 6:00 a.m., rather than 7:00 a.m. We make this suggestion in the belief that 6:00 to 10:00 a.m., is a more realistic prime-time block in radio than 7:00 to 11:00 a.m.

The CBC recognizes that the Commission's object in proposing a 30% Canadian content requirement in each 4-hour period is to ensure the presence of Canadian music throughout the day and particularly in radio prime time. At the same time the CBC believes that the proposed 4-hour reporting period could inhibit program planning. The Metropolitan Opera broadcasts are an obvious example of a program that could run right through a 4-hour period. Another would be a "festival" of music of a particular country or composer or performer during a given day or week. We feel that the Commission's objective and the reasonable needs of program planners could both be met by dividing the 18-hour day mentioned above (6:00 a.m., to midnight) into two or three, rather than four, periods for purposes of computation by stations of Canadian music in local, non-network transmissions.

CONCLUSION

It will be noted that at more than one place in the brief the Corporation has asked that the application of the regulations should be different for its networks and stations than for individual private stations. This is not because we seek exemptions and special privileges. On the contrary, the CBC is prepared to accept and be judged by more stringent requirements than those applying to broadcasters who have not been given the same mandate. What the claim for flexibility in the incidence of the regulations, as between the CBC and other broadcasters does illustrate, we believe, is the fact that it is extremely difficult, if not impossible, to frame regulations which can both meet situations that arise in the private sector and recognize the special obligations and constraints to which the Corporation is subject.

There is no easy solution. Certainly we do not suggest the exemption of the Corporation from regulation as a solution. In our view the most fruitful approach, in circumstances where a monolithic industry-wide approach appears likely to cause the sort of problems we have indicated, might be to have one regulation applying to private licensees and a comparable, but not identical, one applying to the Corporation. The purpose of such an approach, we repeat, would be to recognize operating realities and give the regulations maximum effectiveness.

The CBC recognizes the great difficulty of drafting regulations that will adequately encompass such diverse considerations as Canadian content, universal cultural values and that perennial intangible, program quality. It recognizes, too, the explicit emphasis which the Act places on the Canadian character that the Canadian broadcasting system, and especially the national service, should have.

The Corporation is committed to this emphasis. Accordingly, it supports wholeheartedly the objectives which the Commission is seeking to attain. To this end it is prepared to help in any way it can in the difficult task of framing Canadian content criteria which, while avoiding the dangers of a merely quantitative approach, will as far as possible offer the promise of a broadcasting service that recognizes the legitimate demands of an enlightened Canadianism and, at the same time, exposes Canadians to the achievements, needs and problems of the larger international world of which we are all citizens.

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